

AFFIDAVIT

I, Samuel Brown, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent (SA) with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been since July of 2014. I am currently assigned to the Burlington, Vermont Field Office in the Boston Field Division. I attended the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia full-time for six-and-a-half months. While at FLETC, I received training in practices and methods of illegal firearm possessors, firearm traffickers, and related federal criminal statutes. As a Special Agent, I have conducted and/or participated in a number of investigations involving state and Federal firearm and controlled substance violations. I have interviewed multiple victims, witnesses, and suspects regarding various types of criminal activity. I have also served search warrants for various crimes and have made criminal arrests for firearm and controlled substance violations. Prior to becoming an ATF Special Agent, I was a Law Enforcement Ranger with the United States National Park Service for approximately seven years. As a Ranger, I participated in state and Federal investigations involving possession of illegal weapons including firearms and possession of controlled substances. I also conducted numerous investigative stops and probable cause searches of people and vehicles. I participated in physical surveillance operations and in the service of state and Federal arrest warrants.

2. This affidavit is submitted to show that probable cause exists to believe that Kareem Campbell and Vanessa Brunelle obstructed justice in violation of 18 U.S.C. § 1512(c)(1).

3. The information contained in this affidavit is based on my training and experience, as well as my own investigation and information I received from other agents, law enforcement personnel, and witnesses. This affidavit is intended to show that there is sufficient

probable cause to believe that Kareem Campbell and Vanessa Brunelle committed the foregoing offense and does not set forth all facts I know from my investigation into this matter.

4. On November 10, 2018, at approximately 1:01 a.m., the Burlington Police Department (BPD) received a report of possible gunshots in the area of 50 N. Champlain St. in Burlington, VT. At approximately 1:08 a.m., a victim with a gunshot wound arrived at the UVM Medical Center at 111 Colchester, Ave. in Burlington, VT. The victim was identified as Errol Richards. Richards was taken in to undergo emergency surgery. Richards survived the gunshot and has since been released from the hospital.

5. Early in the investigation, BPD officers spoke with Richards' girlfriend, Tiffany Leclaire. Leclaire was with Richards at or around the time he was shot, and she initially provided differing accounts of what had occurred during the shooting. She first claimed that she did not know who shot Richards. Then, Leclaire informed officers that she was not truthful in her previous statements and she did not want to get in trouble. Leclaire advised the people of interest were Ross Hanvey and his girlfriend, Vanessa, later identified as Vanessa Brunelle. Also present was an unknown black male she only knew as "Junebug's brother . . . Cecil's brother." Officers asked who shot Richards and Leclaire advised she did not know, but Hanvey, Brunelle and the unknown black male were all present.

6. Leclaire then showed law enforcement a Facebook conversation that she had with Hanvey. In the conversation, Leclaire was arranging to purchase drugs from Hanvey in the area of Peru St. near N Champlain St. On November 10, 2018, at approximately 12:30 a.m., Leclaire messaged Hanvey informing him she was close to the Peru Street meet location. I believe this Facebook communication corroborates that Leclaire met with Hanvey shortly before the shooting.

7. On November 10, 2018, BPD Sgt. Nguyen observed Hanvey and Brunelle exit an apartment located at 48 Park Street and start walking towards Simon's, which is directly next door to 48 Park St. Sgt. Nguyen stopped both Hanvey and Brunelle. Hanvey identified himself as Vince Hanvey and Brunelle identified herself as Desiree Brunelle. Both eventually provided their correct identification. Hanvey had an active warrant for his arrest for escape and was taken into custody and transported to BPD. Hanvey later invoked his Miranda rights and requested a lawyer.

8. After Hanvey was taken into custody, Brunelle was voluntarily transported to BPD because she wished to provide a statement. Det. Michael Beliveau, along with Det. Jamie Morris, met with Brunelle. They informed her she did not have to speak with them and could leave at any point. Brunelle advised the following:

a. Brunelle advised she and Hanvey arranged to purchase drugs from Richards and Leclair. Brunelle advised Hanvey has dealt with Richards and purchased cocaine from him before. Brunelle advised that Richards and Hanvey went into an alley out of sight behind a building. Brunelle believed it was taking too long and she had a bad feeling so she called out to Hanvey. She knew Richards from a prior incident where he was trying to "cut/stab someone."

b. Brunelle then saw Richards pointing a gun at Hanvey's face. Brunelle observed Richards jump over a fence followed by Hanvey. Brunelle then heard approximately "two" gunshots. Brunelle believed Richards robbed Hanvey and stole \$2400.

c. When asked who else was present, she advised "Tony and Martin," but they remained away from the altercation between Richards and Hanvey. Brunelle then said that

Tony and Martin did not go outside and it was just her and Hanvey. [As described below, Tony and Martin were later identified as Kareem Campbell and Martin Magnuson.]

d. At some point during the altercation, Brunelle observed Leclair getting out of the car with a large knife. Brunelle left the area and met back up with Hanvey on N. Champlain St., before walking back to the house next to Simon's. [Investigators believe this building to be 48 Park St.]

e. Brunelle advised Hanvey didn't tell her what happened after Richards and Hanvey went over the fence. Brunelle never saw Hanvey with a gun and did not believe anyone else was near them when they went over the fence. Brunelle specified that Tony and Martin were not involved and remained at the house on Park St. Brunelle advised that her cell phone was located within a backpack in the residence.

9. BPD officers later seized a residence located at 48 Park St. and a male identified as Martin Magnuson. At the time officers encountered Magnuson, he had barricaded himself in the attic of 48 Park St. with a knife. Magnuson had an active warrant for his arrest and was claiming that drugs had ruined his life and he had nothing to live for.

10. Magnuson was arrested on the active arrest warrant and shortly thereafter, he told officers that he knew where the gun was and who did the shooting. Magnuson further told officers:

a. Ross and his girlfriend Vanessa Brunelle went to meet up with "the guy who got shot," and his girlfriend Tiffini Leclair, somewhere on Peru St. Richards pulled a fake gun on Ross and "snatched" the two ounces of powder cocaine out of Ross's hand. Richards turned and ran. Ross realized it was a "fake" gun and gave chase.

b. According to Magnuson, Ross then called a person known to Magnuson as “Wezzy” and Wezzy who rushed over to their location.

c. Ross and Richards ran through backyards where Ross cornered Richards at the top of a stairwell. Richards and Ross exchanged words and Richards started coming down the stairs, swinging at Ross. Ross then took out a firearm and started “pistol” whipping Richards. Prior to this, Wezzy arrived and said something along the lines “this nigger isn’t doing this to us. I don’t put up with this.” Martin stated Campbell then grabbed the firearm out of Ross’s hand, pointed it at Richards and shot Richards. Magnuson remembered several shots, perhaps six.

d. Ross grabbed the two ounces of cocaine out of Richards’s front pocket and then ran from the scene. Magnuson stated he ran from the scene. Magnuson stated the firearm was in the dumpster outside 48 Park St.

11. Magnuson has since provided other statements to law enforcement regarding who shot Richards, some of which are not consistent with the above information. Magnuson has always been consistent, however, with the fact that both Brunelle and Wezzy were present for the shooting.

12. On November 10, 2018, Det. Morris and Lt. Trieb made contact with a male that had exited 48 Park St. This male was identified himself by name and date of birth as Kareem Campbell. I know that Kareem Campbell has two prior federal convictions. Both convictions involved controlled substances and one of those convictions involved possessing a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. § 924(c). I know that Campbell just recently got out of federal prison and is currently on supervised released out of New York.

13. I have also searched Facebook for “Kareem Campbell” and found photographs matching the person I know to be Kareem Campbell from the prior federal cases. According to Campbell’s Facebook page, he uses the nickname “Weizzy.”

14. The following are excerpts from law enforcement’s interview with Campbell:

a. Campbell confirmed that he was “Cecil’s brother.” Campbell advised that on the night of the shooting he was hanging out with his girlfriend who gave him a ride to 48 Park St. He advised there were people in the apartment that he did not recognize so he went upstairs. Campbell said the people he didn’t recognize were “two dudes and a female.”

b. Campbell confirmed that “Ross” was in the living room as well as “Vanessa.” Campbell advised he never went outside with Ross and immediately went upstairs where he fell asleep.

c. Campbell advised he was uninvolved in any altercation and said there would be no gunshot residue on his hands.

15. On November 13, 2018 and again on November 19, 2018, I, along with a BPD detective, spoke with a person named Taylor Senna. Law enforcement had received information that Senna was present at 48 Park St. at the time the shooting occurred. During the interviews, Senna confirmed she was at 48 Park St. before and after the shooting. Relevant to this affidavit, Senna said she was with Brunelle when Brunelle hid the gun used in the shooting behind 48 Park St. Senna advised the gun was hidden because someone was “hurt with it.” Senna did not know where the gun could be now other than the Park St. location. Senna said she was the only one that was outside with Brunelle when the gun was hidden and she stood right next to her.

16. I also asked Senna to identify the person who had hurt the other person with the gun and Senna it was the “black guy” at 48 Park St. Senna said she believed it was him because when everyone returned to the house, the black male stated something to the effect of, “I told you guys I don’t mess around.” Senna knew the black male as either “Nick” or “Tony.” I later showed Senna a picture of Kareem Campbell and she confirmed Campbell as the “black guy” who had made those statements after the shooting.

17. After the conversation with Senna, law enforcement searched the area around 48 Park St. but did not locate a firearm.

18. On November 15, 2018, I spoke with Campbell’s United States Probation Officer Allison Aucoin. Aucoin advised she met with Campbell who was now back in the NYC area. Campbell admitted to being in Vermont during the incident told Aucoin that he was in the wrong place at the wrong time. Campbell said he was otherwise uninvolved in the altercation. Ofc. Aucoin advised me that Campbell tested positive for cocaine in his system.

19. On December 11, 2018, BPD officers arrested a person named Christopher Mitchell for domestic assault. Follow his arrest, Mitchell said he had information about the Peru Street shooting and wanted to speak with investigators. The follow are excerpts from BPD Sgt. Nguyen’s report regarding the interview with Mitchell:

a. Mitchell was personally familiar with the people involved in the shooting, including Kareem Campbell a.k.a. Wezzy, Martin, Taylor, Ross and Venessa Brunelle.

b. Mitchell recently broke up with his girlfriend and went to stay with Venessa Brunelle. On either Saturday or Sunday, December 8th or 9th, he was witness to a conversation between Campbell and Brunelle. Mitchell advised that Campbell is currently in Queens, NY and that he wanted the gun back that was involved in the shooting. Campbell promised Brunelle 50

grams of crack and 50 grams of heroin if she would dig the gun up and bring it to New York City for him. Mitchell advised that Campbell was smooth and slick, and Mitchell believes that Campbell might kill Brunelle when she delivers the gun to New York City and stated “two birds with one stone.” The reason Mitchell was concerned is that Brunelle was as witness in the shooting and had hid the gun. Mitchell advised the conversation was via video chat and Facebook messenger.

c. Mitchell described a location in the New North End where the gun had been hidden. Officers pulled up the satellite view of the location on a map via a cell phone. Mitchell pointed out to a wooded area at the corner of Grey Meadow Drive and Cottage Grove. It should noted that Brunelle has been known to stay at the upstairs apartment located at 86 Cottage Grove, which was nearby to the location that that Mitchell pointed out.

d. Mitchell advised that he and Brunelle recently went out to the location that he pointed out and she proceeded to dig up the gun. He advised that the gun was in multiple plastic bags. Mitchell advised that Brunelle told him that it was a gun and that it appeared to be a gun to him even though it was still inside the bag.

20. After speaking with Mitchell, BPD officers went to the location described by Mitchell and located what appeared to be a hole in the ground that had recently been dug. The officers also located two cigarette butts next to the hole.

21. After BPD officers confirmed what appeared to be the location where the gun was hidden, BPD officers contacted me and I reported to BPD to speak with Mitchell further. After a lengthy interview with Mitchell, Mitchell told me where he thought the gun was currently located. Mitchell was providing this information to law enforcement in the hope that he would receive consideration from the States Attorney’s Office at sentencing for his pending and current charges.

It should be noted that no one involved in law enforcement made such a promise to Mitchell. Instead, Mitchell provided the information in the hope that it would help him at some point in the future.

22. Mitchell told me that he believed the gun was located at an apartment on Elmwood Avenue in Burlington. Mitchell described the location of the apartment and pointed at the location on the map. Mitchell advised that the apartment is a known trap house where many drug users stay and use drugs.

23. Mitchell said Brunelle brought the gun to the residence and stashed it in the sofa and was still in the plastic bag. Mitchell advised that he was there when Brunelle hid the gun in the sofa which was within the last 24 hours. Mitchell advised that Brunelle left after hiding the gun and has not come back to the apartment since as far as he knew. Mitchell advised no one knows where the gun is but him and Brunelle.

24. In the early morning hours of December 12, 2018, I, along with other BPD officers, obtained consent to search the apartment described by Mitchell. The search did not recover the firearm. However, in speaking with two other occupants of the apartment (hereinafter referred to as SOIs), they confirmed to me that Brunelle had recently stayed at the apartment and Brunelle had told them that Campbell had asked Brunelle to bring the firearm to him (Campbell) in New York City. The SOIs believed Brunelle had already received money from Campbell (through an unknown intermediary) to pay for her trip to New York City.

25. At approximately 10:20 a.m., on this date, I returned to the apartment on Elmwood Ave and spoke again with the SOIs. The SOIs indicated that Brunelle does not have a phone number and communicates solely using the Facebook messenger app. One of the SOIs indicated that Brunelle had contacted the SOI as recently at 7:00 a.m. this morning and SOI understood the

Brunelle was still in Vermont. The SOIs also indicated that Brunelle and Campbell are currently dating.

26. At approximately 10:47 a.m., one of the SOIs contacted me by phone and said that Brunelle had left Vermont and was possibly as far south as Connecticut, on her way to New York City to see Campbell.

Dated at Burlington, Vermont, this 12th day of December, 2018.



SAMUEL BROWN
ATF Special Agent

Sworn to and subscribed before me this 12th day of December, 2018.



HONORABLE JOHN M. CONROY
United States Magistrate Judge